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September 2, 2019

BY ECF

Hon. Richard M. Berman
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

USDC SDNY
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Re: United States v. Andrew Moody,
Docket No. 19 Cr. 112 (RMB)

10 cr 1160

Dear Judge Berman:

The above case is presently scheduled for a status conference for tomorrow, September 3, 2019 at 12:30 pm. This letter is submitted to reschedule the September 3, 2019 status conference to any any of the following dates: September 18, 2019 (morning hours only), or September 19, 20 or 23, 2019 (at anytime that is convenient to the court).

A.U.S.A. Robert Sobelman and I have been discussing the disposition of the case by plea agreement, and are very close to completing our discussions. A modest continuance will give the parties sufficient time to reach an agreement in this case.

This application has been discussed with A.U.S.A. Robert Sobelman, who states that the government has no objection to this request, including the proposed rescheduled dates. Finally, Andrew Moody consents to an exclusion of time from the Speedy Trial Act pursuant to 18 U.S.C. § 3161 (h)(1) to any of the above dates, so that he can complete plea discussions with the government. Andrew Moody agrees that the delay, to complete favorable plea negotiations in this case, serves the "ends of justice" under 18 U.S.C. § 3161(h)(7).

Conference is adjourned to
Respectfully, 9/19/19 at 2:30 pm.
Guilty plea, if any, is
Anthony L. Ricco referred to magistrate
Anthony L. Ricco Judge. Time is excluded
pursuant to the Speedy Trial
Act for the reasons set forth in
this letter.
SO ORDERED:
Date: 9/3/19 Richard M. Berman
Richard M. Berman, U.S.D.J.

ALR/jh
cc: A.U.S.A. Robert Sobelman (By ECF)